

REMARKS/ARGUMENTS

Favorable reconsideration and allowance of the present application are respectfully requested in view of the following remarks. Claims 1-25 remain pending. Claims 1, 15 and 24 remain independent.

In the Office Action, the Examiner makes the following rejections:

- claims 1-5, 7-13, 15-22, 24 and 25 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Haverinen et al (U.S. Publication 2002/0012433) in view of Ala-Laurila et al (U.S. Publication No. 2002/0009199);
- claim 6 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Haverinen et al in view of Fink et al (U.S. Patent 7,043,633); and
- claims 14 and 23 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Haverinen et al in view of Amin et al (U.S. Patent No. 6,854,014).

Applicants respectfully traverse all prior art based rejections. In the Office Action, the Examiner correctly recognizes that Haverinen et al does not disclose that "authentication takes place before having provided IP connectivity to the user." *See page 4.* To correct this deficiency, the Examiner alleges that Ala-Laurila et al discloses this feature in paragraph [0020]. On the contrary, Ala-Laurila et al does not teach or suggest this feature.

In [0020], Ala-Laurila et al indicates that the PAC "allocates an IP address to the terminal MT and allows a connection to be established to the Internet only if the terminal MT can be authenticated." That is, Ala-Laurila et al discloses on the one hand, the PAC allocates an IP address to the terminal MT and, on the other hand, that the PAC allows a connection to be established to the Internet only if the terminal MT can be authenticated. Despite the Examiner's allegation, there is no suggestion in this paragraph that the IP address allocation takes place after the terminal has been authenticated. Indeed, the suggestion is quite the opposite.

In paragraph [0024], Ala-Laurila refers to Fig. 2 as showing "essential features of a preferred embodiment of the invention for authenticating the terminal MT." Ala-Laurila discloses, "The authentication process of the terminal MT is typically triggered when the MT starts setting up a connection 201 (Connection setup) with the WLAN network WLAN. Then, the MT is provided with an IP address through a DHCP server. Before the terminal MT is allowed to establish a connection with other networks than the network WLAN, the authentication must be performed in an acceptable manner." That is, on the one hand, the IP address is provided to the user before having carried out the authentication procedure, since the IP address is required for communication between the user, the PAC and the GAGW for carrying out the authentication procedure; whereas, on the other hand, IP connectivity to "other

networks" is precluded until having performed a successful authentication of the user.

In other words, Ala-Laurila et al teaches the user receiving an IP address before having been authenticated. Since the authentication is carried out over the IP network, one of ordinary skill must necessarily conclude that the user has also received IP connectivity before having being authenticated, even if such IP connectivity is limited to the entities involved is the authentication procedure, namely between the MT, the PAC and the GAGW.

This is confirmed in paragraph [0023] of Ala-Laurila et al which clearly indicates that the interfaces between the MT and the PAC, as well as between the PCA and the GAGW, are all IP-based interfaces. [0023] also clearly indicates that the MT, PAC and GAGW are all identified using the IP addresses thereof.

In the absence of other identifiers for the MT, PAC and GAGW than respective IP addresses, one of ordinary skill must also necessary conclude that the authentication procedure cannot be carried out in Ala-Laurila et al without having firstly allocated respective IP addresses, and thus having an IP connectivity, even if limited to connections between the MT, PAC and GAGW.

Consequently, neither Haverinen et al nor Ala-Laurila et al discloses "(c) carrying out a challenge-response authentication procedure between the wireless terminal and the public land mobile network through the Access Controller, the wireless terminal provided with a SIM card and adapted for

reading data thereof; wherein the challenge-response authentication submissions in step (c) takes place before having provided an IP connectivity to the user” and “offering the IP connectivity to the user at the wireless terminal, by sending an assigned IP address” as recited in claim 1. Independent claims 15 and 24 also recite similar features. Indeed, Fink and Amin – individually or in combination – also do not disclose these features. Thus, no combination of Haverinen et al, Ala-Laurila et al, Fink et al, and Amin et al teaches or suggests the above-recited features.

In addition, it has been well demonstrated in previous Responses that Haverinen et al actually teaches directly the opposite. Fig. 9 of Haverinen et al illustrates major signaling steps of the system. In step 301, which is the very first step, the mobile terminal (MT) communicates with the public access controller (PAC) to obtain an IP address from a DHCP server. *See [0265].* Subsequent to step 301, the authentication procedure is performed to authenticate the MT to the mobile switching center (MSC) of a mobile network. *See paragraphs [0265]-[0279].* In Haverinen et al, the IP address is allocated to the mobile terminal prior to authenticating the mobile terminal with the underlying mobile network. In other words, Haverinen et al explicitly teaches directly away. *See KSR International v. Teleflex Inc.*, 550 U.S. ____, 127, S. Ct. 1727, 1742 (2007) (invention is more likely to be non-obvious when prior art teaches away).

Thus, any combination of references that includes Haverinen et al cannot be used to reject the claims since the combination by definition would not be obvious. Note that Ala-Laurila et al also teaches away implicitly at the very least.

For at least the reasons stated above, independent claims 1, 15 and 24 are distinguishable over any combination of references Haverinen et al, Ala-Laurila et al, Fink et al and Amin et al. By virtue of their dependencies from independent claims as well as on their own, dependent claims 2-14, 16-23 and 25 are also distinguishable over any combination of the same references.

Applicants respectfully request that the rejections of claims 1-25 be withdrawn.

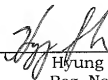
All objections and rejections raised in the Office Action having been addressed, it is respectfully submitted that the present application is in condition for allowance. Should there be any outstanding matters that need to be resolved, the Examiner is respectfully requested to contact Hyung Sohn (Reg. No. 44,346), to conduct an interview in an effort to expedite prosecution in connection with the present application.

The Commissioner is authorized to charge the undersigned's deposit account #14-1140 in whatever amount is necessary for entry of these papers and the continued pendency of the captioned application.

Respectfully submitted,

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By: _____



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